

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Harris Post Office
Harris, Iowa 51345

Docket No. A2012-80

PUBLIC REPRESENTATIVE COMMENTS

(February 8, 2012)

On November 23, 2011, the Commission received an appeal postmarked November 17, 2011 from Jeff Loring, Mayor of the City of Harris (Petitioner Loring). Also, an appeal was received on November 23, 2011, from Connie Hauenstein (Petitioner Hauenstein). Petitioner Loring challenges the sufficiency of the Postal Service's Final Determination and suggests that some of the factors the Postal Service relied upon are erroneous. Petitioner Loring's Appeal. Petitioner Hauenstein requests that the Harris Post Office not be closed permanently rather, she suggests closing the Post Office on Saturdays, because closing the Harris Post Office would be inconvenient. Petitioner Hauenstein's Appeal.

Petitioner Loring states that the Postal Service failed to correctly evaluate the effect the closing of the Harris Post Office would have on the community. The Postal Service failed to mention the population that would be impacted. The Postal Service failed to evaluate alternative financing options that could allow the Postal Service to maintain the Harris Post Office. In addition, the Postal Service failed to consider other possible alternatives. For example, commercial mail providers. Petitioner Loring's

Appeal at 2. Further, Petitioner Loring believes the Postal Service's Harris Post Office's Final Determination was primarily focused on economic savings.

In its Comments regarding Petitioner Hauenstein's concern about the inconvenience of traveling to the Ocheyedon Post Office, the Postal Service indicates that customers do not need to travel to the Ocheyedon Post Office to obtain mail delivery or conduct most retail services. Rural route delivery to mailboxes will provide similar access to postal retail services.¹

In its Comments, the Postal Service states that the appeals appear to raise three main issues: "(1) the impact on the provision of postal services; (2) the impact upon the Harris community; and (3) the estimated economic savings." Comments at 1. The Postal Service reports that it gave the three issues serious consideration. *Id.*

Impact on the provision of postal services. The Harris Post Office, an EAS-11 level post office, has 85 P.O. Box customers, 97 rural route customers and 122 intermediate rural route customers. AR, Item No. 1 at 1. The Harris Post Office's operating hours are 8:00 a.m. to noon and 1:00 p.m. to 4:15 p.m. Monday through Friday and Saturdays from 8:00 a.m. to 9:15 a.m.

The Postal Service proposes that the Ocheyedon Post Office located 6 miles from the Harris Post Office will be the administrative office.² When the Final Determination is implemented, the Ocheyedon Post Office, an EAS-13 level post office, will provide effective retail and rural route services to the former Harris Post Office customers.³

¹ United States Comments Regarding Appeal, January 17, 2012, Comments, at 6.

² AR, Item No. 21 at 1.

³ Comments at 5.

The Ocheyedan Post Office has 127 post office boxes available for rent, which is sufficient to absorb the 85 Harris post office box customers if customers transfer their boxes to the Ocheyedan Post Office. AR, Item 47 at 2. The Ocheyedan Post Office's retail window hours are 8:30 – 11:00 and 12:30 through 4:00 p.m. Monday through Friday and 8:30 to 9:30 on Saturdays. AR, Item No. 42 at 1.

Impact on the community. Harris, Iowa is an incorporated community located in Osceola County.⁴ The community is administrated politically by a Mayor and council. AR, Item No. 41 at 6. The local population of Harris, Iowa was reported to be 200 in FY 2009 and 170 in FY 2010 – a population decline of approximately 15 percent.⁵ For FY 2009, the median age of Harris, Iowa's population was 35.1 years and the median income was \$50,473.⁶ The city has a total area of 0.8 square miles (2.1 km²), all of it land.⁷

The Postal Service distributed 190 questionnaires to Harris Post Office customers, on April 11, 2011. Seventy questionnaires were returned. Of the 70, 6 were favorable, 23 were unfavorable and 41 expressed no opinion. *Id.*, Item No. 42 at 2. Several questionnaire respondents indicate that they currently shop, conduct banking transactions and fulfill their social needs in Spirit Lake or other nearby cities.⁸

One congressional inquiry was received on April 22, 2011, from Senator Grassley requesting that letters sent to him by his constituents be included in the Harris

⁴ AR, Item No. 41 at 6. See *also*, AR, Item No. 33 at 6. The Postal Service states in its Comments that the community is unincorporated. Comments at 7.

⁵ http://en.wikipedia.org/wiki/Harris,_Iowa

⁶ <http://www.city-data.com/city/Harris-Iowa.html>

⁷ http://en.wikipedia.org/wiki/Harris,_Iowa

⁸ AR, Item No. 22 at 40b and c, 43a, 45 b.

Post Office Administrative Record. *Id.*, Item No. 28 at 3 and 4. The Postal Service responded on May 27, 2011. *Id.*, at 1 and 2.

On April 28, 2011, representatives from the Postal Service held a community meeting at the Harris Community building. Seventy-two customers attended the meeting.

Effect on employees. In the Postal Service's Final Determination (FD), it reported that the postmaster retired on March 26, 2010.⁹ Since then an Officer-in-Charge (OIC) has been operating the Harris Post Office. AR, Item No. 47 at 2. According to the Postal Service, the OIC is an employee from another Post Office and will return to her office if the discontinuance is approved. AR, Item No. 41 at 5. In addition, the Administrative Record indicates that instead of a carrier OIC administering the Harris Post Office, a non-career postmaster relief, serving as an OIC, will be separated from the Postal Service if the Final Determination is approved. AR, Item No., 33 at 7. While the discrepancy may not be sufficient to warrant the Harris Post Office Final Determination be remanded, it does indicate that the Postal Service may want to improve the consistency and factual accuracy of its Administrative Records and Comments.

Economic effect. As mentioned previously, the Postal Service initiated the study for possible closure or consolidation of the Harris Post Office for the following reasons: declining volumes and revenues, declining workload and the ability of the Postal Service to provide effective and regular service by an alternate means. *Id.*, Item No. 42 at 1. Revenues and revenue units are provided for three years in Table I below.

⁹ AR, Item No. 47 at 2.

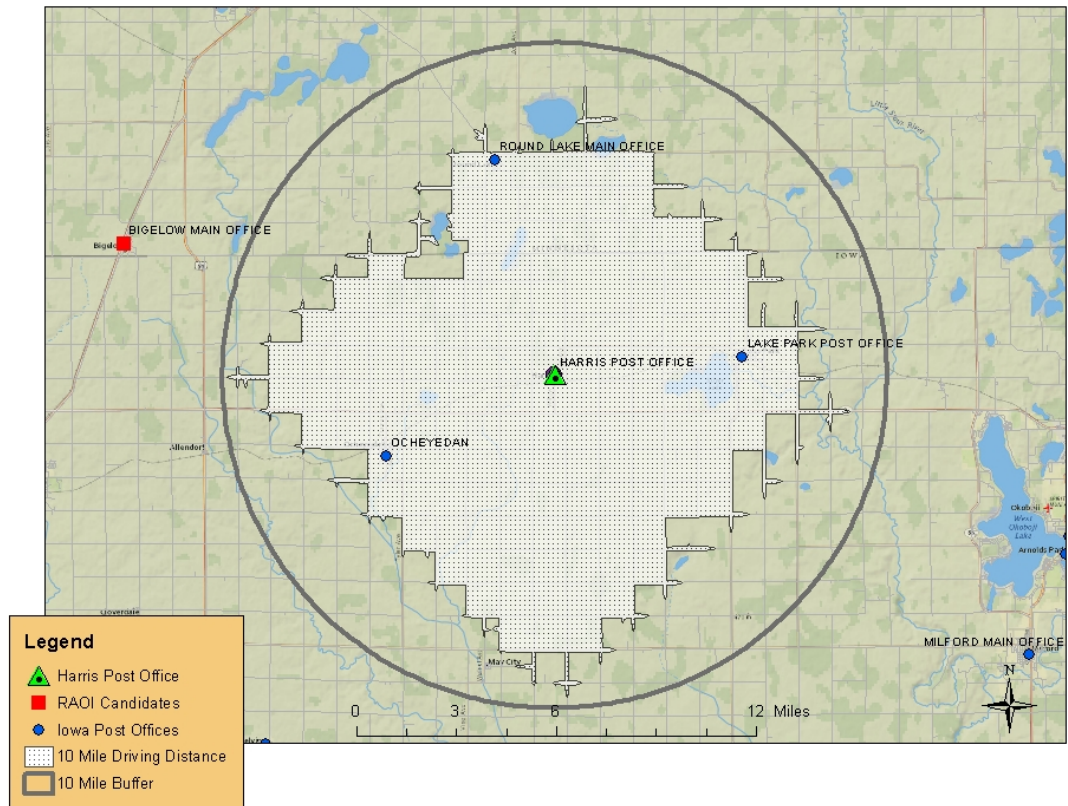
Table I

Year	Revenues	Revenues Units
FY 2008	\$24,946	65
FY 2009	\$25,831	67
FY 2010	\$21,516	56

In closing the Harris Post Office, the Postal Service estimates the annual savings to be \$32,747. That includes an EAS-11 Postmaster's salary and fringe benefits of \$44,279 plus the annual lease costs of \$1,600, less the annual cost of replacement service of \$13,132. *Id.*, 41 at 7. While the existing OIC may not be making the same salary, it is the salary for an EAS-11 postmaster assigned to the Harris Post Office.

Finding. The Public Representative finds that the Postal Service has adequately considered the Petitioners' concerns and has not found a persuasive argument, which would prevent the Commission from affirming the Postal Service's determination to close the Harris Post Office. The Public Representative concludes that the Postal Service has followed applicable procedures, that the decision to close the Harris Post Office does not appear to be either arbitrary or capricious and that the Postal Service has provided the information it used in forming its decision to close the Harris Post Office. However, the Public Representative suggests that for future Post Office Closings, the Postal Service may want to consider reviewing the Administrative Records and the Postal Service Comments for possible inconsistencies. Correction of any inconsistencies may be helpful to the Commission as it deliberates its decision to affirm or remand a closing proposal. For informational purposes, a local map follows.

Harris Post Office - 10 Mile Driving Distance with a 10 Mile Buffer



Respectfully Submitted,

/s/ Pamela Thompson
Public Representative
for Docket No. A2012-65

901 York Avenue, N.W.
Washington, DC 20268-0001
(202) 789-6834; Fax (202) 789-6891
e-mail: pamela.thompson@prc.gov